

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WISCONSIN

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Sarah Haas,

Plaintiff,

Case No. 3:21-cv-680

v.

Easy Cash ASAP, LLC  
*d/b/a* Easy Cash; and  
Clarity Services, Inc.,

Removed from County of St. Croix Circuit  
Court (Case No. 2021CV000352)

Defendants.

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NOTICE OF REMOVAL

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Pursuant to 28 U.S.C. §§ 1441 and 1146 *et seq.*, Defendant Clarity Services, Inc. (“Clarity”) hereby removes the above-captioned action to this Court, with the written consent of Defendant Easy Cash ASAP, LLC *d/b/a* Easy Cash (“Easy Cash”), and states as follows:

1. On October 6, 2021, Plaintiff Sarah Haas (“Plaintiff”) filed a Complaint against Clarity and Easy Cash in the Circuit Court of the County of St. Croix, alleging that Clarity violated the Fair Credit Reporting Act (“FCRA”), 15 U.S.C. §§ 1681, *et seq.*, and that Easy Cash violated the FCRA and Wisconsin’s Privacy Statute, Wis. Stat. § 995.50 (the “State Court Action”).

2. This Notice is being timely filed with this Court within thirty (30) days after Clarity was served on October 7, 2021 with a copy of the Summons and the Complaint,

which sets forth the claims for relief upon which Plaintiff's action against Clarity and Easy Cash is based.

3. Easy Cash, the only other defendant named in the Complaint, has consented to this removal in writing.

4. This United States District Court is the proper District Court for removal because the State Court Action is pending in the County of St. Croix, Wisconsin, which is located within this District.

5. Pursuant to 28 U.S.C. § 1446(a), a copy of all process, pleadings, and orders served upon Clarity in the State Court Action are attached hereto as Exhibit A.

6. The claims for relief against Clarity and Easy Cash alleged in the State Court Action arise under the FCRA, which are based on Plaintiff's allegations that Clarity violated the FCRA by furnishing Plaintiff's consumer report to Easy Cash without a permissible purpose (*see* Compl. at ¶¶ 68–101, 104, 106) and that Easy Cash violated the FCRA by accessing Plaintiff's consumer report without a permissible purpose (*see id.* at ¶¶ 68–101, 103, 105). Thus, this Court has original subject-matter jurisdiction over the above-captioned action pursuant to 28 U.S.C. § 1331 and 15 U.S.C. § 1681p. Accordingly, the above-captioned action may properly be removed to this United States District Court pursuant to 28 U.S.C. § 1441(a).

7. The state law claim for relief against Easy Cash, for invasion of privacy under Wis. Stat. § 995.50, is similarly based on Plaintiff's allegation that Easy Cash improperly accessed Plaintiff's consumer report. (*See* Compl. ¶¶ 107–117.) Thus, the Court may exercise supplemental jurisdiction over Plaintiff's state law claim against Easy

Cash pursuant to 28 U.S.C. § 1367(a) because it is “part of the same case or controversy” as Plaintiff’s FCRA claims.

8. Pursuant to 28 U.S.C. § 1446(d), Clarity is promptly providing written notice of its removal to Plaintiff and will, promptly after the filing of this Notice of Removal, file a copy of this Notice with the clerk of the Court in the State Court Action.

Dated: October 27, 2021

MICHAEL BEST & FRIEDRICH LLP

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